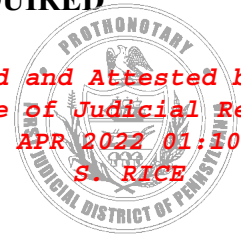


EXHIBIT “A”

Filed and Attested by the
Office of Judicial Records
11 APR 2022 01:10 pm



**COURT OF COMMON PLEAS
PHILADELPHIA COUNTY**

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NO.

One Reading Center
 Filadelfia, Pennsylvania 19107
 Telefono: 215-238-6333
 TTY: 215-451-6197

1. Plaintiff, **Gregory DiStefano** is an individual and resides at the above-captioned address.

2. Defendant, **Walmart, Inc., d/b/a Walmart**, is a Corporation organized under the laws of the Commonwealth of Pennsylvania with its principal place of business at the above captioned address.

3 Defendant, **Walmart - Store 3475**, is a business entity in the Commonwealth of Pennsylvania with its principal place of business at the above captioned address.

4. At all times relevant, defendants owned and maintained the premises of 650 S Trooper Road, Norristown, PA 19403.

5. On June 3, 2020, plaintiff, Gregory DiStefano, was a business invitee, lawfully on the premises of the aforesaid location when he was caused to slip, fall and/or otherwise sustain injuries by reason of coming in contact with hangers and/or other items, the negligent, hazardous and dangerous condition, which was present on the floor, which the defendants knew or should have known was present on the floor which defendants's knew or should have known was a dangerous condition existing on the floor.

6. Despite not having enough staff to open and operate the store, defendants put profits before business invitees knowing that the store would become over crowded.

7. Plaintiff believes and therefore avers that the aforesaid defendants, had, or should have had, notice of the existence of said negligent, hazardous, and dangerous condition which existed on the aforesaid floor prior to the happening of said accident.

8. The carelessness, recklessness, and negligence of the defendants, as herein alleged, consisted of the following:

a. Failing to properly inspect the said floor and the adjacent area;

b. Failing to correct the negligent or hazardous condition which they were aware or should have been aware;

c. Failing to warn pedestrians of the negligent or hazardous condition of the said floor at the point where the plaintiff fell;

d. Failing to maintain the floor in a condition which would protect and safeguard persons lawfully upon the floor and prevent them from falling.

e. Allowing and permitting the aforesaid negligent condition to remain on the aforesaid floor so as to constitute a menace, danger, nuisance or trap to persons lawfully upon the said floor.

f. Creating a hazardous condition and failing to warn the Plaintiff of said condition.

g. Otherwise failing to exercise due and proper care under the circumstances.

9. As a result of the intentional, recklessness and outrageous conduct of defendants, as aforesaid, plaintiff suffered left shoulder impingement syndrome, tear of rotator cuff of right shoulder and right hip sprain as well as other serious and permanent injuries.

10. As a result of the intentional, recklessness and outrageous conduct of defendants plaintiff has been subjected to a substantial increased risk of harm as well as other serious and permanent injuries.

11. As a result of the intentional, recklessness and outrageous conduct of defendants, plaintiff has been and may in the future continue to be required to expend various sums of money for medicine and medical treatment in and about endeavoring to treat and cure himself of his injuries.

12. By reason of the injuries sustained, plaintiff has and may continue to suffer great pain and agony, mental anguish and humiliation and has been and may in the future be hindered from attending to his daily duties, functions and occupation, all to his great damage and loss.

13. As a result of the aforesaid occurrence, the plaintiff has been prevented from attending to his usual daily activities and duties, and may be so prevented for an indefinite period of time in the future, all to his great detriment and loss.

14. As a result of the aforesaid occurrence, the plaintiff has suffered physical pain and mental anguish and humiliation and may continue to suffer same for an indefinite period of time in the future.

15. The conduct of defendants was outrageous and in willful and reckless disregard to plaintiffs' interest, thus entitling plaintiffs to an award of punitive damages.

WHEREFORE, plaintiff demands judgment from the defendant in an amount in excess of Fifty Thousand (\$50,000.00) Dollars.

\s\James R. Radmore
JAMES R. RADMORE, ESQUIRE
Attorney for Plaintiff

VERIFICATION

JAMES R. RADMORE, ESQUIRE, hereby states that he is the attorney for the Plaintiff(s) in this action and verifies that the statements made in the foregoing pleading are true and correct to the best of his knowledge, information and belief. The undersigned understands that the statements therein are made subject to the penalties of 18 Pa. C.S. 4940 relating to unsworn falsification to authorities.

/s/James R. Radmore
JAMES R. RADMORE, ESQUIRE

EXHIBIT “B”

Daly Services		<p>Filed and Attested by the Office of Judicial Records 22-04-0798 01 MAY 2022 08:47 pm S. RICE</p>	
SHERIFF'S RETURN OF SERVICE - (Please prepare separate "return" Form for each Defendant to be served by Sheriff. If you desire a copy of this "Return" mailed to you, please attach self-addressed, stamped envelope for each separate address where service is required)		COURT TERM AND NUMBER 22-04-0798	
TO BE COMPLETED BY ATTORNEY		SHERIFF'S NUMBER LAST DAY FOR SERVICE: 5-11-2022	
PLAINTIFF <u>Gregory DiStefano</u>	#381414	COST \$69.00	MILEAGE
DEFENDANT(S) <u>Walmart Store-3475</u>		DISTRICT <input type="checkbox"/> Summons <input checked="" type="checkbox"/> Other: <u>RPOD</u>	<input checked="" type="checkbox"/> Complaint
SERVE AT <u>650 S. Trooper Rd, Norristown, PA 19043</u>		TYPE OF ACTION <u>Civil</u>	
SPECIAL INSTRUCTIONS <u>Montgomery County Sheriff</u>			
TO BE COMPLETED BY SHERIFF			
Served and made known to <u>DARLENE De Vaughn</u> Defendant(s) on the <u>27th</u> day of <u>April</u> , 2022, at <u>0745</u> o'clock <u>AM</u> . at <u>As Given</u> Street, Commonwealth of Pennsylvania, in the manner described below: <ul style="list-style-type: none"> <input type="checkbox"/> Defendant(s) personally served <input type="checkbox"/> Adult family member with whom said Defendant(s) reside(s). Relationship is _____ <input type="checkbox"/> Adult in charge of Defendant's residence who refused to give a name or relationship <input type="checkbox"/> Manager/Clerk of place of lodging in which Defendant(s) reside(s). <input checked="" type="checkbox"/> Agent or person in charge of Defendant's office or usual place of business <input type="checkbox"/> _____ and officer of said Defendant company <input type="checkbox"/> Other _____ 			
SHERIFF By <u>[Signature]</u> 915 Deputy Sheriff			
On the _____ day of _____, 20____, at _____ o'clock ____ M. Defendant not found because: <ul style="list-style-type: none"> <input type="checkbox"/> Moved <input type="checkbox"/> Unknown <input type="checkbox"/> No Answer <input type="checkbox"/> Vacant <input type="checkbox"/> Other: _____ and make return thereof and according to law 			
SHERIFF By _____ Deputy Sheriff			
TO BE COMPLETED BY ATTORNEY		TO BE COMPLETED BY PROTHONOTARY	
Name <u>Daly Services Inc.</u> Address <u>3227 Riding Court Chalfont PA</u> Telephone Number <u>(267) 784 - 9138</u> Attorney Name <u>James Radmore Esq</u> Represents: <ul style="list-style-type: none"> <input type="checkbox"/> Plaintiff(s) <u>Gregory DiStefano</u> <input type="checkbox"/> Defendant(s) <input type="checkbox"/> Other 		A T T E S T PRO <u>4/11/22</u> Date	

Daly Services

SHERIFF'S RETURN OF SERVICE -

(Please prepare separate "return" Form for each Defendant to be served by Sheriff. If you desire a copy of this "Return" mailed to you, please attach self-addressed, stamped envelope for each separate address where service is required)

COURT TERM AND NUMBER

22-04-079

Filed and Attested by the
Office of Judicial Records
11 MAY 2022 09:34 pm
S. GILLIAM

TO BE COMPLETED BY ATTORNEY

PLANTIFF

Gregory DiStefano

DEFENDANT(S)

Walmart, Inc C/O Ct Corp

SERVE AT

600 N 2nd St, Suite 400, Harrisburg PA 17101

SPECIAL INSTRUCTIONS

Dauphin County Sheriff

SHERIFF'S NUMBER

COST

MILEAGE

DISTRICT

☐ Summons☐ Complaint☐ Other: RPOD

TYPE OF ACTION

Civil

TO BE COMPLETED BY SHERIFF

Served and made known to _____ Defendant(s) on the _____ day of _____, 20____, at _____ o'clock ____ M. at _____ Street, Commonwealth of Pennsylvania, in the manner described below:

- ☐ Defendant(s) personally served
- ☐ Adult family member with whom said Defendant(s) reside(s). Relationship is _____
- ☐ Adult in charge of Defendant's residence who refused to give a name or relationship
- ☐ Manager/Clerk of place of lodging in which Defendant(s) reside(s).
- ☐ Agent or person in charge of Defendant's office or usual place of business
- ☐ _____ and officer of said Defendant company
- ☐ Other _____

SHERIFF

By _____

Deputy Sheriff

On the _____ day of _____, 20____, at _____ o'clock ____ M. Defendant not found because:

- ☐ Moved
- ☐ Unknown
- ☐ No Answer
- ☐ Vacant
- ☐ Other: _____ and make return thereof and according to law

SHERIFF

By _____

Deputy Sheriff

TO BE COMPLETED BY ATTORNEY

Name Daly Services Inc.

Address 3227 Riding Court Chalfont PA

Telephone Number (267) 784 - 9138

Attorney Name James Radmore Esq

Represents:

- ☐ Plaintiff(s) Gregory DiStefano
- ☐ Defendant(s)
- ☐ Other

TO BE COMPLETED BY PROTHONOTARY

A T T E S T
PRO

4/11/22

Date

SHERIFF'S OFFICE OF DAUPHIN COUNTY

Nicholas Chimienti, Jr.
Sheriff



Jack Duignan
Chief Deputy

David B. Dowling
Solicitor

David E. Olweiler
Asst. Chief / Real Estate Deputy

GREGORY DISTEFANO
vs.
WALMART INC. D/B/A WAL-MART

Case Number
2022-T-1007

SHERIFF'S RETURN OF SERVICE

05/02/2022 CASE # 220400798

05/02/2022 Advance Fee

05/04/2022 11:05 AM - DEPUTY TYLER A. BREAM, BEING DULY SWORN ACCORDING TO LAW, DEPOSES AND SAYS, THE COMPLAINT IN CIVIL ACTION AND REQUEST FOR PRODUCTION OF DOCUMENTS WAS SERVED TO LINDSEY FAULKNER, INTAKE SPECIALIST, WHO ACCEPTED AS ADULT IN CHARGE AT THE TIME OF SERVICE TO WIT, WALMART INC. D/B/A WAL-MART AT C/O CT CORP, 600 N 2ND STREET, SUITE 401, HARRISBURG, PA 17101.

TYLER A. BREAM, DEPUTY

SHERIFF COST: \$41.25

SO ANSWERS,

May 06, 2022

NICHOLAS CHIMIENTI, JR., SHERIFF

COSTS

DATE	CATEGORY	MEMO	CHK #	DEBIT	CREDIT
05/02/2022	Advance Fee	Advance Fee	24409	\$0.00	\$41.25
05/06/2022	County Fee			\$41.25	\$0.00
				\$41.25	\$41.25
BALANCE:				\$0.00	

NOTARY

Affirmed and subscribed to before me this

6TH day of MAY, 2022

Commonwealth of Pennsylvania — Notary Seal
Megan Tritt, Notary Public
Dauphin County
My Commission Expires September 29, 2025
Commission Number 1407107

SHERIFF'S OFFICE OF DAUPHIN COUNTY

Nicholas Chimienti, Jr.
Sheriff



Jack Duignan
Chief Deputy

David B. Dowling
Solicitor

David E. Olweiler
Asst. Chief / Real Estate Deputy

GREGORY DISTEFANO
vs.
WALMART INC. D/B/A WAL-MART

Case Number
2022-T-1007



case

DEPOSIT RECEIPT



ledger

Printed: 5/2/2022 8:52:56AM

Receipt No: 31505

Date: 05/02/2022

Type: Civil Action

Paid By: THE RADMORE FIRM, LLC

Check No:	Check Date:	Description:	Deposit Amount:
24409	04/19/2022	Advance Fee	\$41.25

Mail To: THE RADMORE FIRM, LLC
1500 JFK BLVD.
SUITE 520
PHILADELPHIA, PA 19102

Origin: Foreign County Philadelphia

Received by: MT

Case ID: 220400798